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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
corporation;

Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF ELIZABETH L.  
STAMESHKIN IN SUPPORT OF DEFENDANT  
META PLATFORMS, INC.'S OPPOSITION TO  
PLAINTIFFS' ADMINISTRATIVE MOTION  
REQUESTING LEAVE TO OBTAIN LIMITED  
ADDITIONAL DISCOVERY**

I, Elizabeth Stameshkin, declare as follows:

1. I am a Special Counsel at the law firm of Cooley LLP and am counsel for Defendant Meta Platforms, Inc. in the above-captioned case. I provide this declaration upon personal knowledge and, if called upon as a witness, would testify competently as to the matters recited herein.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts of the transcript of the Rule 30(b)(6) deposition of Michael Clark, dated November 13-14, 2024.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 3, 2025, in Pacifica, California.

/s/ Elizabeth Stameshkin  
Elizabeth Stameshkin